

AFFIDAVIT

I, Michael Shea, do hereby state and depose:

1. I was employed by Cal's - SCA as a truck driver

and a dispatcher, from October, 1977 until July, 1986. I

worked as a truck driver, from 1977 until 1983, and as a

dispatcher and a route superintendent, from 1983 until 1986.

When I was employed by Cal's, the company was owned by
SCA and referred to as SCA - Cal's Division.

2. When I worked as a truck driver, I disposed of waste

from the following companies at the Davis GSR Landfill, in
Smithfield-Gloucester, R.I., during a two year period in 1979 and 1980.

A. Foster Forbes Glass - A 40 yard container, which held
Milford, Ma.
broken glass, wooden pallets, and trash.

B. For a one year period, household trash from the city of Attleboro, Ma.

C. Cal's Recycling Plant - At the recycling plant, paper used and
Berkeley, Ma.
created from waste obtained from
supermarkets and department stores.

M.S.

The paper was recycled and the waste

was disposed of the Davis GSR landfill.

D. Benjamin Moore - At least once a week, a 42 yard container Milford, MA. which always had paint present in it. This company made oil based and latex paints. The truck drivers disliked this pickup, because they would get covered with paint from the container. When transporting the container over the highway, paint would leak out of the container and occasionally splash onto other vehicles on the highway. SCA had to pay to have some of these vehicles repainted. When the container was emptied, it was usually dropped at Foster Forbes. This was done because Foster Forbes' waste, which consisted of sand and glass, would absorb whatever paint remained in the container. This container would not be taken to a drywaste store, because the paint residue in the container

M.J.

would contaminate the cardboard waste, so that it could not be recycled in Cal's recycling operation.

E. Turner Construction - roofing material, stone, and concrete
Marshfield, MA

F. Sun Chemical - A 40 yard container, which held paper, paints, ink containers, and ink, which was always present in this container.
Mansfield, MA

G. Armstrong Cork - ~~about~~ 50 lbs. bags with grey and white powder residues. I would and the other drivers would get covered with these powders, when making this pick up.

H. S+D Rubber - A 40 yard container, with grey and black powders, which would cover the drivers, when dumping this load.

I. White at the Davis GSR Landfill. I saw trucks from Goddard Boyer, the SCA Transfer Station, which are located in Boston, MA, Charles George Trucking, and the town of Westley, CA.

MA. disposing of waste. The SCA transfer station was located at Howard's Disposal and contained houses to be waste from the city of Boston, along with commercial waste.

This is a true and accurate statement to the best of my knowledge, information, and belief. I signed under the pain and penalty of perjury this 29th day of August, 1993.

Marvin J. Blute Jr.
My Commission expires 1/30/2000

Michael L. Sher
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